

# Exhibit B

1 BENBROOK LAW GROUP, PC  
2 BRADLEY A. BENBROOK (SBN 177786)  
3 STEPHEN M. DUVERNAY (SBN 250957)  
4 701 University Avenue, Suite 106  
Sacramento, CA 95825  
Telephone: (916) 447-4900  
Facsimile: (916) 447-4904  
brad@benbrooklawgroup.com  
steve@benbrooklawgroup.com

5 Attorneys for Plaintiffs

6 **UNITED STATES DISTRICT COURT**  
7 **CENTRAL DISTRICT OF CALIFORNIA**

8 MARCO ANTONIO CARRALERO;  
9 GARRISON HAM; MICHAEL  
10 SCHWARTZ; ORANGE COUNTY  
11 GUN OWNERS PAC; SAN DIEGO  
12 COUNTY GUN OWNERS PAC;  
13 CALIFORNIA GUN RIGHTS  
14 FOUNDATION; and FIREARMS  
15 POLICY COALITION, INC.

16 Plaintiffs,

17 v.

18 ROB BONTA, in his official capacity as  
19 Attorney General of California,

20 Defendant.

Case No.: 8:23-cv-01798

**DECLARATION OF GARRISON  
HAM IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A  
PRELIMINARY INJUNCTION**

21 I, Garrison Ham, declare:

1. I am over 18 years old. I am competent to give this declaration. I have personal knowledge of the matters set forth in this declaration and would be able to testify to them if called as a witness.

2. I am a citizen of the United States, and a resident and citizen of the State of California, currently residing in Oceanside. I am a member of the San Diego County

1 Gun Owners Association, the California Gun Rights Foundation, and Firearms Policy  
2 Coalition, Inc.

3 3. I am not prohibited under state or federal law from acquiring or  
4 possessing firearms or ammunition.

5 4. I have an active license to carry a concealed weapon (CCW) issued by  
6 the San Diego County Sheriff's Department.

7 5. I am a combat veteran of the United States Army, serving in Afghanistan  
8 from April 2006 to May 2007 and Iraq from December 2009 to August 2010.  
9 Therefore, I am trained and equipped to operate my personal firearm for self-defense.  
10 I currently work in sales.

11 6. I completed multiple training courses and a background check on or  
12 around August 2023 as required by the State of California to obtain my CCW license.

13 7. There are several locations that I regularly visit where SB 2 will infringe  
14 my Second Amendment rights by prohibiting me from carrying my personal firearm  
15 for self-defense.

16 8. With my carry permit, I regularly carry my personal firearm when I enter  
17 stores and other privately owned commercial establishments that are open to the  
18 public. These locations include, for example: grocery stores; gas stations and  
19 convenience stores; and retail establishments, including home improvement and  
20 gardening stores, shopping malls, clothing stores, and open-air markets. If SB2's  
21

1 provision about private businesses were to go into effect, I would restrict my carrying  
2 practices at private businesses for fear of arrest or prosecution.

3 9. With my carry permit, I would regularly carry my personal firearm at and  
4 in restaurants, bars, and other establishments that are licensed to sell liquor for on-site  
5 consumption. These locations include restaurants, sports bars, and breweries.  
6 However, when I filled out my CCW license application, I was informed that even  
7 with a license, I could not carry in bars or any location whose primary purpose is to  
8 dispense alcoholic beverages for on-site consumption. I am unaware of the legal  
9 authority for this restriction, but I comply with it anyway for fear of prosecution. If I  
10 were permitted to visit restaurants and bars while carrying my personal firearm, I  
11 would not consume alcohol while carrying.

12 10. I regularly attend public gatherings for which a permit is required while  
13 carrying my personal firearm, including the weekly Sunset Market in Oceanside, local  
14 farmer's markets, and political rallies and events.

15 11. I regularly visit parks near where I live, including Guajome Park and  
16 Mission Trails. I have also visited parks under the control of the California  
17 Department of Parks and Recreation and Department of Fish and Wildlife, including  
18 Hollenbeck Nature Preserve. I plan to continue visiting these and other parks that are  
19 subject to SB 2's carry ban, and I plan to carry my personal firearm for self-defense  
20 when visiting these parks.

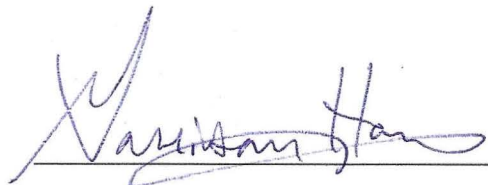


1           12. I frequently return to the San Francisco Bay Area, where I was born and  
2 raised. When I am visiting I often use public transportation (such as BART) when  
3 traveling around the region. I would carry my personal firearm while using public  
4 transportation in the Bay Area.

5           13. I have visited amusement parks with family in the past 12 months, and  
6 plan to go again when babysitting for relatives. I would carry at the parking lot or  
7 within the amusement park, if permitted, particularly to protect my wife and members  
8 of my family who have small children.

9           14. I have every intention and desire to carry in the locations identified  
10 above, and would continue to do so in the future, but I will decline to do so because  
11 of my credible fear of arrest and prosecution after January 1, 2024, when SB 2 takes  
12 effect.

13           I declare under penalty of perjury under the laws of the United States America  
14 and State of California that the foregoing is true and correct. Executed this 26<sup>th</sup> day  
15 of September, 2023.

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17 

18 Garrison Ham  
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